

**REMARKS**

Claims 24-47 are pending in the present application. Although, no claims have been amended in the present response, applicants have provided a listing of the pending claims for the Examiner's convenience.

Claims 24-47 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,631,369 to Meyerzon et al. (hereinafter "Meyerzon"), in view of U.S. Patent No. 6,243,713 to Nelson et al. (hereinafter "Nelson"), and further in view of U.S. Patent No. 5,907,841 to Sumita et al. (hereinafter "Sumita").

Claim 24 recites:

A method for retrieving information using a search engine, the method comprising:  
retrieving a document to be indexed;  
generating a virtual document based on the retrieved document, the virtual document comprising a portion of the retrieved document that characterizes an overall content of the retrieved document and being used to index the retrieved document;  
decomposing the virtual document into a plurality of tokens; and  
storing the plurality of tokens in a search index, wherein the search engine accesses the search index to identify one or more virtual documents that satisfy a search query and retrieves one or more documents corresponding to the one or more virtual documents.

Meyerzon, Nelson, and Sumita do not alone or in combination disclose, teach, or suggest "decomposing the virtual document into a plurality of tokens"

Meyerzon is directed to "a method and system for identifying documents in a document store that have changed, are new, or have been deleted." (Col. 3, lns. 4-6 of Meyerzon). The

Office action states:

Meyerzon . . . does not explicitly disclose decomposing the document into a plurality of tokens. Nelson, on the other hand, discloses the retrieval system for

retrieval of multimedia information including decomposing the document into a plurality of tokens (see abstract of Nelson; Fig. 2 and Fig. 4; col. 5, line 52-col. 6, line 65; col. 7, lines 46-67 and col. 9, lines 60-65).

(December 29, 2005 Office action, pg. 3).

Nelson is directed to “[indexing] compound documents . . . [that include] multimedia components such as text, images, audio, or video components, into a unified common index . . . .” (Col. 2, lns. 22-24 of Nelson). Although Nelson discloses converting a multimedia component into one or more tokens, it does not disclose or suggest “decomposing the virtual document into a plurality of tokens,” as recited in claim 24 (emphasis added).

Specifically, a multimedia component is not a “virtual document,” as recited in claim 24. A “virtual document” is defined in claim 24 as “comprising a portion of the retrieved document that characterizes an overall content of the retrieved document.” Whereas, the “multimedia component” in Nelson is merely an image, video, audio, or text of a compound document and is not necessarily the portion of the compound document that characterizes the overall content of the compound document. In fact, the image, video, audio, or text may be completely unrelated to the overall content of the compound document.

Therefore, even if Meyerzon was combined with Nelson, the combination would neither teach nor suggest “decomposing the virtual document into a plurality of tokens,” as recited in claim 24.

Sumita does not cure the deficiencies of Meyerzon and Nelson. In particular, Sumita is directed to “a document detection system for detecting desired documents from a large number of documents stored in a document database.” (Col. 1, lns. 11-13 of Sumita). Sumita does not

Attorney Docket: DE920000094US1/2265P

disclose, teach, or suggest, and the Office action does not cite any passage of Sumita as disclosing, teaching, or suggesting, "decomposing the virtual document into a plurality of tokens," as recited in claim 24. In fact, the term "token" cannot be found anywhere in Sumita.

Therefore, even if Meyerzon was combined with Nelson and Sumita, the combination would neither teach nor suggest "decomposing the virtual document into a plurality of tokens," as recited in claim 24.

Accordingly, based at least on the reasons above, applicant respectfully submits that claims 24, and the claims that depend therefrom, are patentable over Meyerzon, in view of Nelson, and further in view of Sumita. Since claims 32 and 40 each incorporates limitations similar to those of claim 24, it is respectfully submitted that claims 32 and 40, and the claims that depend therefrom, are patentable over Meyerzon, in view of Nelson, and further in view of Sumita, for at least the same reasons.

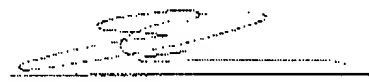
Attorney Docket: DE920000094US1/2265P

CONCLUSION

On the basis of the above remarks, reconsideration and allowance of the claims is believed to be warranted and such action is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

Respectfully submitted,  
SAWYER LAW GROUP LLP

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